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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALEXANDER RODRIGUEZ, an individual,

Plaintiff,

v.

UNICITY INTERNATIONAL, INC., a
Delaware Corporation,

Defendant.

Case No.: 2:25-cv-000754-GMN-NJK

(Related to Case No.: 2:25-cv-00738-GMN-NJK)

**STIPULATION TO EXTEND DEADLINE
FOR PLAINTIFF ALEXANDER
RODRIGUEZ TO RESPOND TO
DEFENDANT UNICITY
INTERNATIONAL, INC.'S MOTION TO
DISMISS FIRST AMENDED
COMPLAINT (ECF NO. 22)**

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Alexander Rodriguez ("Plaintiff"), by and through his respective counsel of record, and Defendant Unicity International, Inc. ("Defendant"), by and through its respective counsel of record, that Plaintiff shall have until August 19, 2025 to file his response to Defendant's Motion to Dismiss First Amended Complaint.

This Stipulation is submitted and based upon the following:

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1 1. Plaintiff's Complaint was filed in the United States District Court, District of Nevada
2 on April 30, 2025 and asserted claims related to Plaintiff's employment with Defendant. (ECF No.
3 1).

4 2. On June 24, 2025, Defendant filed a Motion to Dismiss Plaintiff's Complaint (ECF
5 No. 11).

6 3. On July 8, 2025, Plaintiff filed a First Amended Complaint (ECF No. 16).

7 4. On July 22, 2025, Defendant filed a Motion to Dismiss Plaintiff's First Amended
8 Complaint (ECF No. 22). Thus, Plaintiff must file a response to the Motion to Dismiss First
9 Amended Complaint (the "Motion") within 14-days, on or before August 5, 2025. (*See* LR 7-2(b)).

10 3. Plaintiff's counsel has a pre-planned family vacation during the week of August 4,
11 2025. Due to counsel's schedule, Plaintiff respectfully requests a brief extension to the response
12 deadline to respond to the Motion.

13 4. The Parties have agreed to extend the deadline for Plaintiff to file his response to
14 Defendant's Motion to Dismiss First Amended Complaint by two-weeks, from August 5, 2025 to
15 August 19, 2025, based upon Plaintiff's counsel's vacation during the week the response is due.

16 5. This is the first stipulation to extend the time for Plaintiff to respond to Defendant's
17 Motion to Dismiss First Amended Complaint.

18 6. The Parties believe these circumstances constitute good cause for granting an
19 extension. *See* Fed. R. Civ. P. 6(b)(1).

20 7. This Stipulation is made in good faith and not for the purpose of delay.

21 **SO STIPULATED.**

22 Dated this July 24, 2025.

23 **GREENBERG GROSS LLP**

LITTLER MENDELSON, P.C.

24 /s/ Marian L. Massey

/s/ Taylor A. Buono

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Attorneys for Defendant Unicity International, Inc.

Attorneys for Plaintiff Alexander Rodriguez

1 **IT IS SO ORDERED:**

2
3 Plaintiff's deadline to file his response to
4 Defendant's Motion to Dismiss First
5 Amended Complaint by two-weeks,
6 from August 5, 2025 to August 19, 2025

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8 
9 UNITED STATES DISTRICT JUDGE

10 Dated: July 25, 2025
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